

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

LARRY MONROE, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Civil Action No.: 3:05CV00074

CITY OF CHARLOTTESVILLE, VIRGINIA,
TIMOTHY J. LONGO, SR., in his official
capacity, and JAMES MOONEY, in his official
capacity

Defendants.

**OBJECTIONS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANTS**

COME NOW Defendants, by counsel, and for their Objection to Plaintiff's Second Set of Interrogatories and Requests for Production of Documents to Defendants state as follows:

Defendants object to Plaintiff's Second Set of Interrogatories and Request for Production of Documents on the basis that the Court's Order of May 22, 2006 limited discovery to the class certification issues and stayed all other discovery until the issue of class certification has been resolved.

While the Court has granted Plaintiff's Rule 56(f) motion and the parties, in conjunction therewith, contemplated conducting general discovery, the Court's May 22, 2006 Order is still in effect. Defendants' counsel has proposed, to Plaintiff's counsel, that the parties conduct an additional Rule 26(f) conference and thereafter provide a report and proposed order to the Court addressing the discovery issues.

CITY OF CHARLOTTESVILLE, VIRGINIA,
TIMOTHY J. LONGO, SR., in his official capacity,
and JAMES MOONEY, in his official capacity
By Counsel



Richard H. Milnor, Esquire, VSB #14177
John W. Zunka, Esquire, VSB #14368
Alvaro A. Inigo, Esquire, VSB #38663
Zunka, Milnor, Carter & Inigo, Ltd.
414 Park Street
P O Box 1567
Charlottesville VA 22902
Phone: (434) 977-0191
Fax: (434) 977-0198
rmilnor@cstone.net
jzunka@cstone.net
ainigo@cstone.net

CERTIFICATE OF SERVICE

I hereby certify that on the 17 day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Neal L. Walters, Esquire
Scott Kroner, PLC
418 East Water Street
P O Box 2737
Charlottesville VA 22902
nwalters@scottkroner.com

Deborah C. Wyatt, Esquire
Wyatt & Associates
300 Court Square
Charlottesville VA 22902
Dwesq@aol.com

Corban A. Klug, Esq.
Scott Kroner, PLC
418 East Water Street
P.O. Box 2737
Charlottesville, VA 22903
cklug@scottkroner.com

